



Oregon

John A. Kitzhaber, M.D., Governor

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August 27, 2002

Mr. Joe Mollusky
Port of Portland
Box 3529
Portland, OR 97208

**Re: Parcel C - No Further Action Determination
Marine Terminal 1 South
Portland, Oregon
ESCI No. 2642**

Dear Mr. Mollusky:

The Department of Environmental Quality (DEQ) Voluntary Cleanup and Portland Harbor Section completed our review of the information submitted to date regarding the site investigation of Parcel C (also referred to as Parcel 1) of the Marine Terminal 1 South (T1S) site in Portland, Oregon. This information was submitted as part of the T1S Remedial Investigation (Hahn and Associates, 2001). Parcels A and B are not subject to this letter and the selected remedial action for these parcels will be described in the site Record of Decision (ROD). The ROD is anticipated to be issued by DEQ in September 2002.

Parcel C is comprised of all of Lots 11 and 12, and a portion of Lot 13 of the River Block of Watson's Addition to the City of Portland. The site is located in Multnomah County in Township 1 North, Range 1 East of the Willamette Meridian, southwest of Section 28. The legal description of Parcel C is attached.

DEQ reviewed the available environmental information regarding Parcel C and concluded that the investigation of the site is complete and that the site does not present a significant threat to human health or the environment. It is DEQ's determination that no further action (NFA) is required at the site. The basis for the NFA is presented in DEQ's Staff Report, dated July 12, 2002 and is summarized below:

1. Several phases of site characterization have been conducted at the site. Limited soil and groundwater sampling was conducted between 1998 and 2001. These investigations documented the presence of low levels of metals in site soil and groundwater. These concentrations are in general less than regional background concentrations. Total petroleum hydrocarbons and low levels of volatile organic compounds were detected in MW-1.
2. Groundwater is not currently used and is not reasonably likely to be used at the T1S facility. There is no documented potable use of groundwater within a 1-mile radius of the site and the

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City of Portland has supplied drinking water to the westside industrial district for decades. Therefore, human exposure to groundwater via ingestion or direct contact was not considered a complete pathway.

3. The risk assessment report (Hart Crowser, 2002^{1, 2}) did not identify unacceptable risks to current or future human receptors (i.e., residents, commercial workers, and excavation and construction workers) exposed to contaminated soil within Area C. While arsenic concentrations detected in soil on Parcel C exceed DEQ's acceptable risk level for residential and commercial worker scenarios, there were no detected concentrations of arsenic in surface soil in Area C that exceeded the site specific background level of 5.3 mg/kg identified in the Remedial Investigation report (Hahn and Associates, 2001³). Therefore, the risk in Area C is considered acceptable.
4. A Public Notice regarding DEQ's recommended remedial action for the T1S facility, including the proposed a "no further action" finding for Parcel C, was published on July 1, 2002. A 30-day public comment period was held July 15, 2002 through August 15, 2002. No comments were received.

The NFA determination is based on the available analytical data. The risk assessment demonstrates that the known contamination does not pose an unacceptable risk to human health or the environment.

DEQ recommends that site development plans include the use of properly trained contractors and include contingencies for oversight by an environmental professional in the event unexpected contaminated soil is discovered. The role of the environmental professional is to assure contaminated soil is appropriately identified and managed, and to assess unexpected site conditions encountered during excavation activities. Please notify DEQ if unexpected contamination is encountered during site development activities.

DEQ's NFA determination will not be applicable if new or undisclosed facts show that the investigation and cleanup does not comply with the referenced rules. We recommend that a copy of all information be maintained with the permanent site records.

¹ Hart Crowser (2002). Terminal 1 South Human Health and Ecological Baseline Risk Assessment – Portland, Oregon. Prepared for The Port of Portland. Dated January 18, 2002.

² Hart Crowser (2002). Terminal 1 South Human Health and Ecological Baseline Risk Assessment Addendum – Portland, Oregon. Prepared for The Port of Portland. Dated June 2002.

³ Hahn and Associates (2001). Terminal 1 South Remedial Investigations Report (Volumes 1 & 2). Prepared for The Port of Portland. Dated July 12, 2001.



Mr. Joe Mollusky
Port of Portland
ECSI File No. 2642
August 27, 2002
Page 3 of 3

DEQ files and the Environmental Cleanup and Site Information (ECSI) database will be updated to reflect the No Further Action determination. If you have questions please feel free to contact me at (503) 229-5562. Thank you for your participation and cooperation in DEQ's Voluntary Cleanup Program.

Sincerely,

Rod Struck
Project Manager
Voluntary Cleanup and Portland Harbor

Cc: ECSI File 2642
Mike Rosen, DEQ/NWR
Jeff Bachrach, Ramis, Crew, Corrigan & Bachrach
Tim Ralston, Riverscape, LLC

Attachment – Parcel C – Legal Description

